

EXHIBIT E

Excerpts of the Deposition of Diana Avramova

Pages: 23-30, 35-42, & 67-74

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CAROLYN ENZOR, as Next Friend
of K.L.N.E. and K.A.E., and
JULIANNE GLISSON, as Temporary
Administrator of the Estate of
KA'LA ENZOR,

Plaintiffs,

v.

THE KROGER CO.,

Defendant.

CIVIL ACTION NO.:

CV422-083

DEPOSITION OF
DIANA AVRAMOVA

June 7, 2023
10:13 a.m.

7 East Congress Street, Suite 712
Savannah, Georgia

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<p style="text-align: center;">23</p> <p>1 So the second shift is probably about one person</p> <p>2 closing.</p> <p>3 Q. Explain that to me.</p> <p>4 A. For example, we have two to three people</p> <p>5 during the day that is in my department.</p> <p>6 Q. Right.</p> <p>7 A. And we have one closer which come in 2:00</p> <p>8 o'clock to 10:00 p.m.</p> <p>9 Q. Okay.</p> <p>10 A. Because we try to do all the work and left</p> <p>11 the department set up for the night shift clearly and</p> <p>12 full.</p> <p>13 So my job is to make sure everything is</p> <p>14 clear and full before I left at 3:00, for example, if</p> <p>15 I'm working 7:00 to 3:00. So going to have smooth</p> <p>16 nights.</p> <p>17 Q. So middle shift, was that a time that</p> <p>18 Kroger would bring in an employee to prepare --</p> <p>19 A. Yes. The middle shift is mainly just to</p> <p>20 fill the gap. Because this is a busy store and the</p> <p>21 product is getting faster out of the shelves so that</p> <p>22 is the middle shift for.</p> <p>23 They work frozen sometimes. We have a lot</p> <p>24 of products. We just need to go out to the freezer,</p> <p>25 fill up the freezers, work and serve the customers</p> <p style="text-align: center;">GILBERT & JONES</p>	<p style="text-align: center;">25</p> <p>1 Q. When did that become the norm?</p> <p>2 A. That become last year.</p> <p>3 Q. Sometime in 2022?</p> <p>4 A. Yes, but I can't remember which is exactly</p> <p>5 the month.</p> <p>6 Q. Don't worry about that. So it went from a</p> <p>7 clock in with your finger to an app system to show</p> <p>8 that you were there and everything like that?</p> <p>9 A. Yes.</p> <p>10 Q. After you clock in now on any given day</p> <p>11 with your app, would you go directly to your</p> <p>12 department; is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. And when you get to your department, would</p> <p>15 each day there be a meeting or anything about, hey,</p> <p>16 this is what we need to do today or did you just know</p> <p>17 what your roles were and begin working?</p> <p>18 A. So when I clock in, I usually go to the</p> <p>19 locker dressed up with my apron, the blue apron. So</p> <p>20 put your apron and I go to the department.</p> <p>21 And usually I know what to do. Sometimes</p> <p>22 my manager is navigating me, what they didn't do at</p> <p>23 night and what I should have to do, but most of the</p> <p>24 time I know what I need to do and I start to open the</p> <p>25 department, fill it up, the empty shelves, and check</p> <p style="text-align: center;">GILBERT & JONES</p>
<p style="text-align: center;">24</p> <p>1 behind the counter and make sure the shelves is full</p> <p>2 too.</p> <p>3 Q. For the night shift?</p> <p>4 A. Yes.</p> <p>5 Q. What was the night shift? When did that</p> <p>6 start?</p> <p>7 A. The night shift is from 2:00 to 10:00.</p> <p>8 Q. Okay.</p> <p>9 A. That's it.</p> <p>10 Q. The first thing you would do, my</p> <p>11 understanding is you would go to the manager's office</p> <p>12 and clock in with your fingerprint. Is that correct?</p> <p>13 A. No. I go to the clock time, which is out</p> <p>14 of the manager's office. It's like a small machine</p> <p>15 and it's to the wall.</p> <p>16 So everybody go to this machine and put</p> <p>17 their fingers and clock in and out but in this -- but</p> <p>18 right now they changed the system so we have my time</p> <p>19 right now so we can clock from the phone and they</p> <p>20 changed this machine, so we don't put the fingers</p> <p>21 anymore. We just punch the number. So you have your</p> <p>22 special number. It's only your number.</p> <p>23 Q. And you're able to do it through a phone</p> <p>24 app or something?</p> <p>25 A. Yes.</p> <p style="text-align: center;">GILBERT & JONES</p>	<p style="text-align: center;">26</p> <p>1 what I need, mark down, scan out the products, like</p> <p>2 out of date products need to be scanned out, and fill</p> <p>3 it up with the new product which is exchange it and</p> <p>4 stuff like that.</p> <p>5 Q. I got you. I got you. And your time from</p> <p>6 2008 up until the time of the incident we're talking</p> <p>7 about, were there ever any individuals that you</p> <p>8 noticed or knew of that were dedicated solely to</p> <p>9 security present at the Berwick Kroger?</p> <p>10 A. I really don't understand the question.</p> <p>11 Q. From 2008 until the time of the incident,</p> <p>12 just based on your observations, did you ever observe</p> <p>13 any security personnel people that were in charge of</p> <p>14 just providing security?</p> <p>15 A. So we used to have a security in the store</p> <p>16 but it was long time ago, I guess from eight, maybe</p> <p>17 more years, maybe ten years ago.</p> <p>18 We used to have a security overnight but</p> <p>19 we were open 24 hours, and after that they took it</p> <p>20 off.</p> <p>21 The Kroger decide to cut that security but</p> <p>22 I'm not sure which year that happened but I remember</p> <p>23 we used to have the security overnight and during the</p> <p>24 day too.</p> <p>25 Q. Did that person wear like a security</p> <p style="text-align: center;">GILBERT & JONES</p>

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1 uniform?

2 A. Yes.

3 Q. Do you remember if they were provided any
4 kind of -- did they have guns or weapons or anything?

5 A. I'm not sure about the gun but they have
6 the blue shirt, like the blue -- I'm not sure how to
7 say that.

8 Q. Something that you recognize them as a
9 security guard?

10 A. Yes, and they have a badge number like
11 police.

12 Q. During that time period, and I think you
13 said it was probably at least ten years ago that
14 there was security personnel at the Berwick Kroger?

15 A. Yes.

16 Q. How many security personnel would be on
17 for any shift?

18 A. Just one.

19 Q. And where would that security person be
20 stationed?

21 A. They were up front next to the door when
22 you go in.

23 Q. Right when you would walk in, there would
24 be security personnel?

25 A. Yes.

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1 Q. Did they have their own office or were
2 they just standing there?

3 A. No, they don't have office. They just
4 standing there I guess six, eight hours. I'm not
5 sure how many hours but they just standing there.

6 Q. Did they give them a chair?

7 A. No.

8 Q. No chair. They would be there at the
9 opening of the entrance?

10 A. Yes.

11 Q. And you don't remember what year that
12 security guard was taken away?

13 A. Sorry. I'm not.

14 Q. Did anyone tell you why they removed the
15 security personnel from the Berwick Kroger store at
16 any point?

17 A. They told me because just Kroger decide to
18 drop off that budget. I'm not sure why but that's a
19 Kroger decision. That's what they told me.

20 Q. From that time, after those security
21 personnel left, you never saw any uniformed security
22 personnel at the Berwick Kroger?

23 A. No.

24 Q. What is your understanding -- if you don't
25 understand, then please tell me so.

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1 A. Sure.

2 Q. What is your understanding of the person
3 at the Berwick Kroger store, if there was any, who
4 was in charge of security procedures?

5 MS. O'HEARN: At what point in time?

6 MR. SHIPLEY: The date of the incident.

7 THE WITNESS: So you asked me who was the
8 person who was in charge for the security?

9 Q. (By Mr. Shipley) Yes, ma'am, at the time
10 of the incident.

11 A. I'm not sure I know who was the person for
12 the security because in this position we don't have
13 nobody so I'm not sure.

14 Q. In your time there from 2008 up until the
15 date of the incident in April of 2021, were you ever
16 required to attend any meetings where security
17 procedures were discussed for the store?

18 A. No, not at all.

19 Q. Were you ever provided as an employee any
20 kind of employee manuals or anything like that?

21 A. We take the test like for the employees
22 but I didn't get like a verbal instruction for
23 security but I took the test.

24 Q. When you say no verbal, you mean no
25 classes or anything?

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1 A. Yes, that's what I mean.

2 Q. Where would you take these tests?

3 A. Frequently, every year.

4 Q. Once a year there would be a test?

5 A. Yes. I took the test a while ago,
6 probably a month ago again. It was a computer test.

7 Q. Where was the computer located that you
8 took the test on?

9 A. It's upstairs. We have some desks for
10 employees, for the manager, assistant manager, and
11 for each leader -- each manager, like the deli
12 manager, produce, meat manager. We have some
13 different desks. So it's upstairs near to manager's
14 office.

15 Q. Near the manager's office?

16 A. Yes.

17 Q. When you say upstairs, the upstairs would
18 be when a customer first comes into the store and
19 goes left; is that correct?

20 A. Yes.

21 Q. Is that office above the restrooms?

22 A. So the office is located, when you go to
23 the store, it's on the left. So you'll have the
24 stairs and that is like a second floor and we have
25 one room which is manager's office and we have open

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<p style="text-align: right;">35</p> <p>1 A. Yes.</p> <p>2 Q. Were you able to take it home with you?</p> <p>3 A. Yes.</p> <p>4 Q. Were you given one every year?</p> <p>5 A. No.</p> <p>6 Q. Just kind of when you started?</p> <p>7 A. Yes, a long time ago.</p> <p>8 Q. Do you still have it?</p> <p>9 A. I don't have that.</p> <p>10 Q. So what I'm going to show you next is what</p> <p>11 I've marked as Plaintiff's Exhibit 2 which is titled</p> <p>12 the Loss Prevention Reference Manual. Would you take</p> <p>13 a look at that and tell me if you've ever seen a copy</p> <p>14 of that.</p> <p>15 A. No, I didn't see that before.</p> <p>16 Q. Maybe you've answered my question but have</p> <p>17 you ever seen a copy of that manual at the Berwick</p> <p>18 Kroger anywhere?</p> <p>19 A. At Kroger? They probably have that but</p> <p>20 I'm not sure.</p> <p>21 Q. That's okay. I'm going to show you what I</p> <p>22 marked as Plaintiff's Exhibit 3 which is the Asset</p> <p>23 Protection Reference Manual. Have you ever seen a</p> <p>24 copy of that manual?</p> <p>25 A. No, but I took the videos which is pretty</p> <p style="text-align: center;">GILBERT & JONES</p>	<p style="text-align: right;">37</p> <p>1 away during the day shift which it was around</p> <p>2 Starbucks.</p> <p>3 We have so many accidents. Like with the</p> <p>4 flip-flops, they slide and lay down on the floor</p> <p>5 because we had some spilled water on the floor and</p> <p>6 she didn't see the sign.</p> <p>7 In my experience I got one person who was</p> <p>8 just lay down on the floor because she was slipped</p> <p>9 and she said she's going to sue Kroger and she was on</p> <p>10 the front door for about half an hour, laid down,</p> <p>11 talking with the phone with the police. Because she</p> <p>12 wanted to sue Kroger and she was sitting right there.</p> <p>13 It was a big drama.</p> <p>14 Q. Okay.</p> <p>15 A. So on the safety videos, the safety</p> <p>16 videos, they say we just have to talk with the</p> <p>17 managers, like the store manager, meat manager.</p> <p>18 That's what we need to do. Nothing else.</p> <p>19 Q. Report it to the managers?</p> <p>20 A. Report it to the managers and they will</p> <p>21 call 911 and get the action and everything else. My</p> <p>22 job like a person. That's it. Nothing else.</p> <p>23 Q. I got you. Would the Berwick Kroger or</p> <p>24 management team or anyone provide any documentation</p> <p>25 or reports of criminal activity that occurred within</p> <p style="text-align: center;">GILBERT & JONES</p>
<p style="text-align: right;">36</p> <p>1 much similar. I took some tests with this but not</p> <p>2 like on the paper.</p> <p>3 Q. So you think some of the videos contain</p> <p>4 some of the subject matter that's contained within</p> <p>5 the Asset Protection Manual?</p> <p>6 A. Yes.</p> <p>7 Q. Have you ever seen or know where the</p> <p>8 location of the Asset Protection Manual is at the</p> <p>9 Berwick Kroger? For instance, if you had to go find</p> <p>10 it today, do you know where to look?</p> <p>11 A. If I'm honest, I don't.</p> <p>12 Q. All right. That's all I wanted to ask you</p> <p>13 about that.</p> <p>14 During these computer tests and videos,</p> <p>15 did the videos address anything about identifying</p> <p>16 potentially dangerous persons within Kroger or</p> <p>17 suspicious behavior, anything like that?</p> <p>18 A. Yes.</p> <p>19 Q. Can you tell me a little bit about that.</p> <p>20 A. So, for example, if we see somebody.</p> <p>21 Because from my experience we have so many people --</p> <p>22 we had one lady. She passed down the floor near to</p> <p>23 my department which was the produce department and I</p> <p>24 been there.</p> <p>25 We had one person who is I guess passed</p> <p style="text-align: center;">GILBERT & JONES</p>	<p style="text-align: right;">38</p> <p>1 the store to its employees such as you?</p> <p>2 A. I don't know.</p> <p>3 Q. Probably the same answer but did the</p> <p>4 management of Kroger ever provide any kind of report</p> <p>5 or documentation of criminal activity that occurred</p> <p>6 within the Berwick Shopping Center? And when I say</p> <p>7 that, not just at Kroger but all the other stores</p> <p>8 that are contained within.</p> <p>9 A. I don't know that either.</p> <p>10 Q. You've never seen any kind of</p> <p>11 documentation or anything like that?</p> <p>12 A. No.</p> <p>13 Q. Did Kroger management ever talk to you</p> <p>14 about safety procedures when traveling to your car</p> <p>15 after a shift or anything like that?</p> <p>16 A. No.</p> <p>17 Q. Would you ever as a Kroger employee</p> <p>18 receive reports about what they refer to as shrinkage</p> <p>19 or lost product?</p> <p>20 A. Yes.</p> <p>21 Q. How would that come up?</p> <p>22 A. Because every morning we used to have a</p> <p>23 meeting but right now they cut it. We don't have</p> <p>24 that. Sometimes we do but sometimes we don't.</p> <p>25 So they give us the numbers, how many</p> <p style="text-align: center;">GILBERT & JONES</p>

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1 percent we have lost and how many percent we have
2 shrink and like theft. We have our numbers with the
3 paper.

4 Q. So there would be a paper that showed how
5 many --

6 A. Yes. They give it to each department.

7 Q. How frequently was that given?

8 A. Every morning. Every other morning. But
9 that is like a short meeting, about ten minutes.
10 Like a huddle. We have huddles.

11 Q. Would you have huddles within departments
12 or would it be storewide?

13 A. It's from all departments and they call on
14 the intercom. So, for example, we're going to a
15 certain place which they call. Sometimes it's in the
16 back room. Sometimes it's upstairs with the
17 manager's office.

18 We have a huddle and they talk about how
19 many percent we're up, how many percent we're down,
20 each department, how we're doing in the store.

21 Q. Would management during these meetings,
22 would they provide any advice or guidelines or
23 recommendations to its employees about how to prevent
24 more shrinkage or loss of product?

25 A. Yes, they give advice.

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1 Q. What kind of advice would they give?

2 A. So, for example, make sure before you
3 throw away something, just scan it out so that is
4 less shrink and less theft. That's one of the
5 examples.

6 The other one is because we donate some
7 food for the company and just make sure you punch it
8 to the donation, not for theft or stealing stuff.

9 Q. Would they ever address trying to identify
10 actual thefts in action or anything like that, where
11 a customer was coming in, for example, you know,
12 putting a couple of cans of kidney beans in their
13 pocketbook or something like that?

14 A. No. No.

15 Q. You said sometimes these meetings would
16 take place in the back. What is in the back of
17 Kroger?

18 A. The back of Kroger means like the
19 receiving.

20 Q. Where the trucks pull up?

21 A. Where the truck is coming and this area is
22 restricted for the customers. It's just employees.

23 Q. Got you.

24 A. So that is actually a part of safety. So
25 if you see somebody which is not with The Kroger and

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1 it doesn't look like Kroger employee, you can ask
2 them what are you doing here, are you a customer, are
3 you lost.

4 Because we used to have some -- I
5 definitely have some customers like that. They
6 looking for the restroom and they just go over the
7 wrong door. So that means the back area.

8 Q. The back area, does it have like freezers
9 and refrigerators in there?

10 A. Sure. Yes.

11 Q. And when trucks would deliver additional
12 food, would it first go to the back?

13 A. Yes.

14 Q. And then from there employees could take
15 some of that product and put it back on the shelves
16 and things like that?

17 A. Yes.

18 Q. Were there offices back there at all?

19 A. No, we don't have offices.

20 Q. Where is the employee safe or the Kroger
21 safe at Berwick located?

22 A. A safe?

23 Q. Yes. Do you know was there a safe?

24 A. For the money?

25 Q. Yes, for the money.

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1 A. I don't know.

2 Q. So you've never seen a safe?

3 A. I've never seen the safe. I saw the bank
4 truck which is coming, and I guess it's behind the
5 customer service. We have a small room but I've
6 never been there so I'm not sure.

7 Q. It's a small room behind customer service?

8 A. Yes, but I've never been there so I'm not
9 sure.

10 Q. Is it locked?

11 A. It's locked all the time.

12 Q. How do you get access to that; do you
13 know?

14 A. I don't know. That's not my business.

15 Q. The manager, have you ever seen him access
16 it?

17 A. Yes. They go in there.

18 Q. You don't know what's in there though,
19 right?

20 A. I don't know what is in there. Right now
21 they have a machine which is a special machine,
22 collect all the money and count the money for the
23 cash register for cashiers but after that I don't
24 know where does the money go.

25 Q. And you couldn't just open that door,

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1 A. Yes.
 2 Q. So they separate each other; is that
 3 right?
 4 A. That's right.
 5 Q. You tell me if I'm wrong in any of this.
 6 So while you're in the women's locker room, you hear
 7 pounding; is that correct?
 8 A. Yes.
 9 MS. O'HEARN: Object to the form.
 10 Q. (By Mr. Shipley) What did you hear? Tell
 11 me that.
 12 A. So I hear some -- her voice is begging for
 13 help. She said help, help me, get off of me. That's
 14 what I heard. And I said, oh, something happened,
 15 somebody is in trouble.
 16 Q. Okay.
 17 A. I was in panic. I didn't know what to do
 18 and followed the Kroger instruction with this. So I
 19 run out and I go grab Malanna because I saw her.
 20 That is my first reaction.
 21 And she called Mr. Edwards who was up
 22 front of the store too. So he came after her. So
 23 the three of us go to them. Me and Malanna, we go
 24 inside in the women's bathroom, and Mr. Edwards was
 25 outside.

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1 Q. And that's what we just watched on the
 2 video?
 3 A. Yes.
 4 Q. Is when you and Malanna went in there?
 5 A. Because if you captured that before, I go
 6 out from my shift and I go check my -- I didn't check
 7 out my lunch box but I go to the restroom and that is
 8 happening and I didn't see the person who is inside
 9 in the restroom. I just saw --
 10 Q. The first time you were in there?
 11 A. The first time. I just saw the woman's
 12 flip-flops. Because it was only me in the restroom.
 13 Q. Where were her flip-flops? Just under the
 14 stall or were they out?
 15 A. What?
 16 Q. Were they within a closed stall or were
 17 they on the floor outside of the stall?
 18 MS. O'HEARN: He's asking when did you see
 19 the flip-flops?
 20 THE WITNESS: I saw the flip-flops because
 21 you can see who is walking. Because I using the
 22 first room. And you know how they have like an
 23 open area from the bottom and you can see who is
 24 passing by.
 25 Q. (By Mr. Shipley) Was she within the stall

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1 at that time, Ms. Enzor, in her flip-flops?
 2 A. Yes.
 3 Q. Okay.
 4 A. She just passed by and she using the last
 5 door. That's what I heard. I'm not sure because I
 6 really don't see but I hear. Her door was locked.
 7 I'm not sure.
 8 Q. Was it the handicapped stall?
 9 A. Yes.
 10 Q. Is that the last stall?
 11 A. The last one.
 12 Q. The larger stall?
 13 A. The largest.
 14 Q. When you went in that first time, was that
 15 larger stall door closed?
 16 A. The door was open but nobody was in the
 17 restroom when I was in there. It was only me.
 18 Q. Only you?
 19 A. Yeah, and we have two more rooms and the
 20 handicap room.
 21 Q. Do you believe the first time you went in
 22 there the assailant, the kidnapper and rapist, was
 23 also in the bathroom during the first time?
 24 A. Nobody was inside. Nobody was inside.
 25 Q. No one was in there the first time?

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1 A. No one.
 2 Q. So you think he came in after you?
 3 A. Yes.
 4 Q. But you remember the first time you went
 5 in you did see flip-flops; is that right?
 6 A. Yes.
 7 Q. Do you know if that was Ms. Enzor or it
 8 could have been someone else?
 9 A. I don't know if that's her but that's the
 10 only woman who was --
 11 Q. During that first visit to the restroom,
 12 nothing seemed out of the ordinary to you; is that
 13 correct?
 14 A. Correct.
 15 Q. So you left and went to the locker room?
 16 A. Yeah, I just left the restroom and I went
 17 to the locker and I hear the voice and she was
 18 screaming, like begging and screaming and fighting
 19 with him.
 20 Q. Could you make out the conversations or
 21 anything like that?
 22 A. No.
 23 Q. In your mind you knew something wasn't
 24 right?
 25 A. That's right.

GILBERT & JONES

<p style="text-align: center;">71</p> <p>1 Q. You said you went and got Malanna?</p> <p>2 A. Malanna.</p> <p>3 Q. Did y'all at that time notify the manager</p> <p>4 as well?</p> <p>5 A. Yes, she just called Mr. Edwards.</p> <p>6 Q. On a radio?</p> <p>7 A. No. Because he was up front bagging and I</p> <p>8 called her and I told her can you come with me</p> <p>9 because somebody is begging for help. And she called</p> <p>10 him and he came with us.</p> <p>11 Q. I got you. So he never entered the</p> <p>12 restroom. The assailant had already run out, right?</p> <p>13 A. Yes.</p> <p>14 Q. After that did you see the assailant run</p> <p>15 through the store at all or did he disappear?</p> <p>16 A. I barely remember -- I didn't see him</p> <p>17 running out the store. Right now because it's been a</p> <p>18 long time ago and my memory is not that fresh and</p> <p>19 strong, but I just remember he just was sweating and</p> <p>20 he was just running behind my shoulder and I</p> <p>21 remember -- that's what I remember.</p> <p>22 I barely remember he was running. In my</p> <p>23 memory I remember he was running with a close but I</p> <p>24 saw on the video he was running around the store.</p> <p>25 Q. That's the last you saw of him?</p> <p style="text-align: center;">GILBERT & JONES</p>	<p style="text-align: center;">73</p> <p>1 know -- he doesn't -- because I was wondering if he</p> <p>2 knew her or not. He told me he doesn't know her.</p> <p>3 Q. Okay.</p> <p>4 A. And I never seen -- he asked me if I'd</p> <p>5 seen him before. I never seen him before. And some</p> <p>6 questions about store safety and he told me I did a</p> <p>7 great job, tried to help her and I did the best what</p> <p>8 I can.</p> <p>9 Q. Have you ever since that incident</p> <p>10 expressed to your manager or any other management</p> <p>11 personnel at Kroger about your reticence or your</p> <p>12 desire not to use that restroom?</p> <p>13 MS. O'HEARN: You mean after the fact?</p> <p>14 MR. SHIPLEY: After the fact.</p> <p>15 THE WITNESS: After the fact? I didn't</p> <p>16 discuss that. I guess Malanna did the same</p> <p>17 thing. Frequently -- if she's working up front</p> <p>18 and I frequently see her, she's using the back</p> <p>19 room.</p> <p>20 Q. (By Mr. Shipley) Have you ever made any</p> <p>21 suggestions that you believe could make that public</p> <p>22 restroom where the incident happened safer?</p> <p>23 MS. O'HEARN: Object to the form. You can</p> <p>24 answer.</p> <p>25 THE WITNESS: So we discussed that with</p> <p style="text-align: center;">GILBERT & JONES</p>
<p style="text-align: center;">72</p> <p>1 A. Yes.</p> <p>2 Q. Was it your understanding that somebody</p> <p>3 ran out The Kroger and apprehended him?</p> <p>4 A. Yes.</p> <p>5 Q. Following this incident, were there any</p> <p>6 kind of meetings that the managers had there with the</p> <p>7 employees?</p> <p>8 A. I don't know.</p> <p>9 Q. You don't remember?</p> <p>10 A. After the accident happened, I spoke with</p> <p>11 my manager, the store manager too, but if they talked</p> <p>12 with the employees, I don't know.</p> <p>13 Q. You had a discussion with the store</p> <p>14 manager?</p> <p>15 A. Yes.</p> <p>16 Q. What was that about?</p> <p>17 A. Because everybody was in shock, the whole</p> <p>18 store, because the cashiers, they also saw him and a</p> <p>19 lot of customers running after him.</p> <p>20 I tried to run but I was freezing at this</p> <p>21 time and I tried to run but I can't control myself.</p> <p>22 I tried to run and I can't. I was -- I don't know.</p> <p>23 Very stressed.</p> <p>24 We just discussed what happened and my</p> <p>25 manager said that can happen everywhere, just, you</p> <p style="text-align: center;">GILBERT & JONES</p>	<p style="text-align: center;">74</p> <p>1 Ms. Malanna so they can make it safer and we</p> <p>2 discussed this with Mr. -- not with Mr. Edwards,</p> <p>3 with the other manager, with Marcus when he</p> <p>4 become the manager.</p> <p>5 So we tell him to put some camera on that</p> <p>6 corner which is on the corner by the lockers.</p> <p>7 So they can put the camera because I personally</p> <p>8 don't feel safe in this area.</p> <p>9 That's what we discussed, but they say</p> <p>10 they can't put the camera because this is a</p> <p>11 public restroom and it's -- I don't know.</p> <p>12 Q. (By Mr. Shipley) They don't want to put a</p> <p>13 camera in a public restroom? And, again, you</p> <p>14 personally don't feel safe within the locker room or</p> <p>15 that restroom?</p> <p>16 A. I don't feel safe in this area period.</p> <p>17 Q. Why, again, is that, that you do not feel</p> <p>18 safe in that area?</p> <p>19 A. I don't know. Because probably the</p> <p>20 accident. And I really hate they put the locker</p> <p>21 again on this wall which remind me over and over</p> <p>22 again what happened and I try to erase that with my</p> <p>23 memory but it looks like I can't. I'm going to live</p> <p>24 with that.</p> <p>25 Q. Do you feel like the restroom is in an</p> <p style="text-align: center;">GILBERT & JONES</p>